



Poly Property Group Co., Limited

保利置業集團有限公司

(Incorporated under the laws of Hong Kong with limited liability)
(Stock Code: 00119)

WHISTLEBLOWING POLICY

(Policy adopted on October 2022)

1. PURPOSE

The aim of this whistleblowing policy (the “**Policy**”) is to encourage employees and relevant third parties who have serious concerns about any aspect of the activities of Poly Property Group Co., Limited (the “**Company**”) and its subsidiaries (the “**Group**”) to come forward and voice those concerns.

2. POLICY STATEMENT

The Policy is designed to ensure that you can raise your concerns about wrongdoing or malpractice within the Group without fear of victimisation, subsequent discrimination, disadvantage or dismissal.

It is also intended to encourage and enable you to raise serious concerns within the Group rather than ignoring a problem or 'blowing the whistle' outside.

This Policy aims to:

- encourage you to feel confident in raising serious concerns at the earliest opportunity and to question and act upon concerns about practice;
- provide avenues for you to raise those concerns and receive feedback on any action taken;
- ensure that you receive a response to your concerns and that you are aware of how to pursue them if you are not satisfied; and
- reassure you that you will be protected from possible reprisals or victimisation if you have made any disclosure in good faith.

3. SCOPE OF THE POLICY

The Policy is intended to enable those who become aware of wrongdoing in the Group affecting some other person or service, to report their concerns at the earliest opportunity so that they can be properly investigated. It is not designed to further any personal disputes, question financial or business decisions taken by the Company nor should it be used to reconsider any staff matters which have been addressed under the grievance procedure already in place. Whistleblowing matters may include but not are confined to:

- (i) breach of legal or regulatory requirements;
- (ii) criminal offences, breach of civil law and miscarriage of justice;
- (iii) malpractice, impropriety or fraud relating to internal controls, accounting, auditing and financial matters;
- (iv) endangerment of the health and safety of an individual;
- (v) damages caused to the environment;
- (vi) violation of rules of conducts applicable with the Company or the Group;
- (vii) improper conduct or unethical behaviour likely to prejudice the standing of the Company;
- (viii) bribery or corruption; and/or
- (ix) deliberate concealment of any of the above.

If the internal inquiry revealed that the wrongdoing involved reasonable suspicion of a criminal offence, the investigation should not jeopardise any future investigation by a law enforcement agency. After the consultation of the Group's inhouse legal department and/or the Group's legal adviser, a report may be made to the appropriate law enforcement agency.

4. IMPLEMENTATION

The audit committee of the Company (the “**Audit Committee**”) has overall responsibility for implementation, monitoring and periodic review of this Policy. The Audit Committee has delegated the day-to-day responsibility for administration of the Policy to audit and risk management department (「審計與風險管理中心」) (“**Audit & RM Department**”). If there are any questions about the contents or application of this Policy, please contact Audit Committee in writing as stated below.

5. PROTECTION

It is the Company's policy to make every effort to treat all disclosures in a confidential and sensitive manner after an employee or a relevant third party reports concern about any of the above matters. The identity of the individual employee or relevant third party making genuine and appropriate allegation under the Policy is assured of fair treatment. In addition, employees are also assured of protection against unfair dismissal, victimisation or unwarranted disciplinary action, even if the legitimate concerns that are raised turned out to be unsubstantiated. The Company reserves the right to take appropriate actions against anyone who initiates or threatens to initiate retaliation against those who have raised concerns under the Policy. In particular, employees who initiate or threaten retaliation will be subject to disciplinary actions, which may include summary dismissal. Management will support all employees and encourage them to raise legitimate concerns without fear of reprisals.

6. CONFIDENTIALITY

The Company will make every effort to keep all whistleblowing reports and identities of employees and/or third parties who have made reports confidential. There may be circumstances, because of the nature of the investigation or the nature of the concerns raised, in which it will be necessary to disclose the identity of the employees and/or third parties who have made the report as required by law or regulatory obligations. In order not to jeopardise the investigation and any follow-up actions, employees and/or third parties who have made reports are also required to keep confidential all information about and related to the report, including the fact that a report has been filed, the nature of the concerns, the identities of those involved and any other information that the Company has shared in the course of handling the report.

7. ANONYMOUS REPORTS

As the Group takes reporting of misconducts, malpractices, and irregularities seriously and wants to conduct warranted investigations of both potential and actual violations, it is preferred that these reports are not made anonymously.

8. UNTRUE ALLEGATIONS

If you make an allegation in good faith and reasonably believing it to be true, but it is not confirmed by the investigation, the Audit Committee will recognise your concern and you have nothing to fear. If, however, you make an allegation frivolously, maliciously or for personal gain, appropriate action that could include disciplinary action, may be taken.

9. INVESTIGATION

The investigation will be handled by the Audit & RM Department. Upon receiving a whistleblowing case, the Audit & RM Department will record the whistleblowing case reported in a register and will be followed up. Audit & RM Department will evaluate the validity and relevance of the cases reported (in consultation with the disinterested members of the management of the Company and other external expertise, if necessary). The Audit & RM Department may enlist internal or external legal, accounting, human resources, or other advisers, as appropriate in any investigation and shall have access to all books and records of the Group and the co-operation of all directors, officers, employees and agents during an investigation.

If the person or matter concerned relates to the head of the Audit & RM Department, the whistleblowing case should be referred to the managing director (“**MD**”) of the board of directors of the Company. The MD, with the assistant of the Audit & RM Department, will carry out the investigation. Under this circumstance, the head of the Audit & RM Department should abstain from involving in any processes of investigation.

If the Audit & RM Department or the MD, as the case may be, considers the reported case involved reasonable suspicion of a criminal offence, after the consultation of the Group’s inhouse legal department and/or the Group’s legal adviser, the case may be referred to relevant regulatory authority(ies), such as the Hong Kong Police Force, the Independent Commission Against Corruption, the Securities and Futures Commission, etc.

10. REPORT TO THE AUDIT COMMITTEE

Status of the investigation will be reported to the Audit Committee on a half-year basis. The report should include the number, the nature, and the outcome of the

whistleblowing cases received and investigated under this Policy. In addition, any complaints that may have material consequences for the Company and the Group shall be promptly reported to the Audit Committee. The register of all whistleblowing cases will be tabled at the Audit Committee in its regular meetings during the year.

11. REPORTING CHANNEL

(I) Employees of the Group or relevant third parties who have legitimate concerns can report to the head of the Audit & RM Department of the Company through the following channels:

(i) In writing to head of the Audit & RM Department:

Attn: Head of the Audit and Risk Management Department of Poly Property Group Co., Limited

Address: Room 2503, 25/F, Admiralty Centre, Tower 1, 18 Harcourt Road, Hong Kong

In a sealed envelope clearly marked “Strictly Private and Confidential – To be Opened by Addressee Only”; or

(ii) By email to whistleblowing@polyhongkong.com.hk.

(II) Employees of the Group or relevant third parties who have legitimate concerns which the case involved the head of the Audit & RM Department of the Company, please report the case to MD of the Company through the following channel:

In writing to MD of the Company:

Attn: Managing Director of Poly Property Group Co., Limited

Address: Room 2503, 25/F, Admiralty Centre, Tower 1, 18 Harcourt Road, Hong Kong

In a sealed envelope clearly marked “Strictly Private and Confidential – To be Opened by Addressee Only”.

(III) For any questions about the contents or application of this Policy, please contact the Audit Committee of the Company in writing:

Attn: The Audit Committee of Poly Property Group Co., Limited

Address: Room 2503, 25/F, Admiralty Centre, Tower 1, 18 Harcourt Road, Hong Kong

In a sealed envelope clearly marked “Strictly Private and Confidential – To be Opened by Addressee Only”.

Any business units within the Group in receipt of a report alleging any of the above types of misconducts, malpractices or irregularities shall redirect the report to head of the Audit & RM Department of the Company, which will handle such report in the same manner as stipulated in this Policy.

12. RECORDS RETENTION

Records shall be kept for all reported misconducts, malpractices, and irregularities by employees or the relevant parties to the Group. In the event a reported irregularity leads to an investigation, the party responsible for leading / conducting the investigation shall ensure that all relevant information relating to the case is retained, including details of corrective action taken for a period not exceeding six years (or whatever other period may be specified by any relevant legislation).

13. FOLLOW UP ACTIONS

The result of the investigation may be communicated to the whistleblower were deemed appropriate. Information provided to a whistleblower is subject to privacy considerations of those against whom the allegations are made and the Group’s confidentiality practices. The detailed investigation report will not be provided. If the whistleblower is not an employee, he or she must sign a confidentiality agreement prior to receiving information on the outcome of the investigation.

14. REVIEW OF THE POLICY

The Audit Committee of the Company will regularly review this Policy and its implementation to ensure the effectiveness and relevancy of this Policy.